

MEMO ENDORSED

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PRINCETON ■ EDISON ■ NEW YORK

PRACTICE LIMITED TO EMPLOYMENT MATTERS AND RELATED LITIGATION

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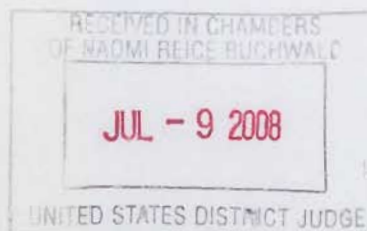
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July 9, 2008

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Hon. Naomi Reice Buchwald
 United States District Judge
 United States District Court for the
 Southern District of New York
 500 Pearl Street
 New York, NY 10007



Re: *Mann v. Plus One Holdings, Inc. et al.*
Civil Action No. 07-CV-5691

Your Honor:

Under the current scheduling order, Defendants' motions for summary judgment are due within thirty (30) days following the close of fact discovery. Since Plaintiff will not now be deposed until the period between August 5 and August 12, and assuming that her deposition does not lead to a need for additional fact discovery, motions would be due sometime during the second week of September under the order.

I apologize for not thinking of this during our conference on Monday, but I have a prepaid family vacation scheduled for August 23 through September 7. It may be premature to make this request, because we do not yet know what form Plaintiff's compliance with Your Honor's directives will take. To be prudent, however, we respectfully request that the current summary judgment deadline be stayed pending resolution of outstanding discovery due from Plaintiff. Alternatively, we ask that the deadline be extended to September 30 or later. Counsel for Co-Defendants joins in this request. Plaintiff's lawyers have consented to it.

We appreciate the Court's consideration of this request.

Respectfully,

Deborah Martin Norcross

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Any motion for summary judgment should be made no later than September 30, 2008. No further extensions so ordered.
 Ann Reice Buchwald
 7/10/08

cc: Harold Derschowitz, Esq. (By Email)
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